

EXHIBIT 20

From: [Michael Gottlieb](#)
To: ebutowsky@gmail.com
Cc: [Meryl Governski](#); [Joshua Riley](#)
Subject: RE: From Ed Butowsky
Date: Monday, December 31, 2018 12:44:24 PM
Attachments: [2018.12.31 Gottlieb Ltr to Butowsky re 12.26.2018 Email.pdf](#)

Mr. Butowsky - Please see the attached correspondence.

Michael J. Gottlieb
Partner

BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington, DC 20005

-----Original Message-----

From: ebutowsky@gmail.com [<mailto:ebutowsky@gmail.com>]
Sent: Wednesday, December 26, 2018 10:53 PM
To: Michael Gottlieb; Meryl Governski; Joshua Riley
Subject: From Ed Butowsky

I recently became aware of a written statement that your firm issued in March, plus an interview with Anderson Cooper on CNN, where you accused me of intentionally "making things up" about Seth Rich and Aaron Rich. I never made up anything about anybody, much less intentionally. You need to issue a retraction and public apology, or you're going to get sued for defamation yourself.



December 31, 2018

VIA ELECTRONIC MAIL

Mr. Ed Butowsky
Chapwood Investments, LLC
2200 Bradbury Court
Plano, TX 75093
ebutowsky@gmail.com

Re: **Response to December 26, 2018 Email**

Dear Mr. Butowsky,

I write in response to your December 26, 2018 email to me. Please direct this correspondence to the attorney or attorneys, if any, who represent you.

Even taking at face value that you only recently became aware of the statements referenced in your email, your threat to sue me and my colleagues is empty. Our statements regarding this matter do nothing more than repeat the truthful allegations that appear in Mr. Aaron Rich's Complaint filed against you in federal court. In case you have forgotten what those allegations are, you may wish to review the Complaint, including but not limited to Paragraph 83. As the Complaint makes clear, the statements to which you are now objecting are no different from the truthful allegations that have appeared in our client's Complaint against you from the outset. The law is clear that we have an absolute legal privilege to advance our client's allegations in connection with those proceedings, as well as on TV, in print, and elsewhere. "The judicial proceedings privilege . . . is well-settled in District of Columbia law." *Messina v. Krakower*, 439 F.3d 755, 760 (D.C. Cir. 2006). "An attorney at law is absolutely privileged to publish defamatory matter concerning another in communications preliminary to a proposed judicial proceeding, or in the institution of, or during the course and as a part of, a judicial proceeding in which he participates as counsel, if it has some relation to the proceeding." *Id.* (quoting Restatement (Second) of Torts § 586 (1977)).

If you decide to bring a frivolous lawsuit notwithstanding our absolute privilege to advance our client's truthful allegations against you, we will immediately file for dismissal and seek Rule 11 sanctions, including reimbursement of our fees.

Regards,

A handwritten signature in blue ink, which appears to read "Michael J. Gottlieb", is written over the typed name. The signature is fluid and stylized, with a long horizontal stroke at the end.

Michael J. Gottlieb